

The Evidence Checklist

RE: One vendor request, tested against the FCC's 2024 carrier location-data orders

The four carriers fined in 2024 had consent terms in their vendor contracts. None could produce the record for a single request. Pick the vendor that touches customer data most often, pull one real request from the last 30 days, and answer with records you can retrieve today. The contract does not count as a record.

VENDOR

REQUEST DATE

REVIEWED BY / ON

QUESTION AND WHAT TO PULL	BASIS IN THE ORDERS	ANSWER
01 Can we name who made this request, and for which approved use? Pull: The request log entry: requester identity and the approved-use reference it maps to.	64.2010(a); AT&T FO para. 43; T-Mobile FO para. 51	☐ Y ☐ N
02 Can we produce the consent or authorization behind it, dated before the request? Pull: The consent or authorization artifact, timestamped earlier than the request.	47 U.S.C. 222(c)(1); 64.2007(b); AT&T FO para. 39	☐ Y ☐ N
03 Did we verify that authorization, rather than relying on the vendor's contract? Pull: Your own verification step (who checked, when, how), kept apart from the vendor's attestation.	2007 CPNI Order para. 49; T-Mobile FO para. 44; 47 U.S.C. 217	☐ Y ☐ N
04 Have we tested that a spoofed or out-of-scope request would fail? Pull: A dated test result showing a spoofed and an out-of-scope request were refused on the live path.	AT&T FO paras. 43-44; Verizon FO para. 48	☐ Y ☐ N
05 Could counsel hand this record over without claiming privilege? Pull: Rows 1 to 4 assembled as counsel would produce them, with no privilege claim or redaction needed.	2007 CPNI Order para. 63; AT&T FO para. 52 n.178	☐ Y ☐ N

YOUR COUNT

Y ____ N ____ Every N is a row the 2024 orders counted against the carriers.

RE-RUN LOG

Run it again on the same vendor after any fix.

30 days

60 days

90 days

Case status as of October 22, 2026. The D.C. and Second Circuits upheld the fines on the merits. The Supreme Court upheld the FCC's fine process (FCC v. AT&T, June 4, 2026). AT&T's refund request is on remand in the Fifth Circuit; T-Mobile and Sprint's Supreme Court petition (No. 25-1422) is pending. Current version and updates: mobilesecurityguru.com/brief/027. FO = Forfeiture Order (AT&T FCC 24-40, Verizon FCC 24-41, Sprint FCC 24-42, T-Mobile FCC 24-43). Reference material and the author's analysis, not legal advice.